

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

United States of America,

Plaintiff,

v.

Civil Action No.: 5:19-cv-928 (GTS/TWD)

One 2012 Toyota Venza XLE, VIN #: 4T3B3BB7CU073918,

\$9,000.00 in U.S. Currency,

\$4,000.00 in U.S. Currency,

\$2,000.00 of \$19,315.00 in U.S. Currency, and

One 2010 Subaru Forester 2.5X Premium,  
VIN #: JF2SH6CC2AH704182,

Defendants.

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

The United States of America brings this verified complaint for forfeiture *in rem* against the above-captioned assets (the “defendant properties”) and alleges as follows:

**NATURE OF THE ACTION**

This is an action *in rem* brought pursuant to 21 U.S.C. § 881(a)(4) and (6) and Rule G of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions. Forfeiture is sought of the defendant properties as money or property furnished or intended to be furnished in exchange for a controlled substance, proceeds traceable to such an exchange, or property used or intended to be used to transport or facilitate the transportation of controlled substances, all in violation of 21 U.S.C. §§ 841 and 846.

**THE PARTIES**

- 1) Plaintiff is the United States of America.

2) The defendant properties are:

- a) One 2012 Toyota Venza XLE, VIN #: 4T3B3BB7CU073918, which is in the custody of the United States;
- b) \$9,000.00 in U.S. Currency, which is in the custody of the United States;
- c) \$4,000.00 in U.S. Currency, which is in the custody of the United States;
- d) \$2,000.00 of \$19,315.00 in U.S. Currency, which is in the custody of the United States; and
- e) One 2010 Subaru Forester 2.5X Premium, VIN #: JF2SH6CC2AH704182, which is in the custody of the United States.

### **JURISDICTION AND VENUE**

3) This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355.

4) This Court has *in rem* jurisdiction over the defendant properties pursuant to 28 U.S.C. § 1355(b).

5) Venue is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395.

### **FACTS**

6) Since approximately July 2018, members of the Drug Enforcement Administration (“DEA”) and New York State Police Community Narcotics Enforcement Team (“CNET”) have been investigating several individuals, including Gavin Ballog, Yan Morales, and Juan Santa, in connection with their involvement in a large-scale heroin trafficking organization in the Syracuse, New York metropolitan area.

7) The investigation by DEA and CNET has involved the use of multiple controlled buy transactions, including the purchase of over fifty-three (53) “bricks” of heroin (2,650 individual glassine baggies), multiple surveillance operations involving the targets of the

investigation and the subject locations, and hundreds of intercepted drug related telephone conversations of organization leaders, Gavin Ballog and Yan Morales.

8) Investigators identified Gavin Ballog as the local heroin source of supply, and the leader and organizer overseeing lower level distributors and couriers.

9) Investigators identified Yan Morales as Gavin Ballog's main "lieutenant" and heroin distributor for the organization.

10) Investigators identified Bryan Morales and Juan Santa as primary distributors for the organization.

11) Investigators determined that the organization utilized multiple vehicles for transportation of illegal narcotics, including vehicles titled to individuals other than organization members (including spouses), and multiple locations to hide narcotics, including "stash houses."<sup>1</sup>

12) DEA agents, CNET investigators, and the United States Attorney's Office, Northern District of New York, consider this to be one of the largest heroin seizures in the history of undercover narcotics investigations in the area.

13) During the investigation, law enforcement determined that members of the organization were generating a substantial amount of proceeds from illegal drug activity involving the use of various items of personal property (including vehicles) by members of the organization.

14) Upon information and belief, all of the indicted co-conspirators (including the organization leaders and main distributors) are unemployed, except for Dennis Smith, who purports to be a self-employed barber.

15) Surveillance and recorded telephone conversations revealed that spouses and significant others of the organization leaders and main distributors were aware of and participated

---

<sup>1</sup> A "stash house" is a house where drugs, drug proceeds and/or weapons are hidden.

in the illegal drug activity, and also participated in attempts to conceal the activity from law enforcement.

16) On or about February 2, 2019, Federal search warrants were executed for multiple residential locations targeted by agents and law enforcement as being occupied by individuals involved in the drug trafficking organization.

17) On or about February 2, 2019, several items were seized by agents and law enforcement pursuant to the Federal search warrants, including but not limited to currency, vehicles, narcotics, and weapons.

18) Several vehicles were seized administratively under DEA administrative authority at the time of the execution of the Federal search warrants.

19) On May 9, 2019, a criminal indictment was filed by the United States of America against identified targets, including Gavin Ballog, Yan Morales, Juan Santa, Jesus Manuel Lopez-Mendez, Bryan Morales, Jerry Massa, Ariel Massa, Carlos Torres, Gregorio Pizzaro, aka "P," aka "Pirulo," Gregory Darrain aka "G-Shop," Michael Calderon, and Dennis Smith, charging them with violations of 21 U.S.C. § 846 (Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance) and 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute a Controlled Substance). The criminal case (5:19-CR-189 (GTS)) is still ongoing.

One 2012 Toyota Venza XLE, VIN #: 4T3B3BB7CU073918

20) Claimant, Johanna Santa-Ballog, is the registered and titled owner of the 2012 Toyota Venza XLE, VIN #: 4T3B3BB7CU073918 ("Toyota Venza"). The Toyota Venza was purchased in July 2018.

21) Claimant, Johanna Santa-Ballog, is the wife of Gavin Ballog, an indicted defendant in the criminal case (5:19-CR-189 (GTS)).

22) The Toyota Venza was seized under DEA administrative authority on or about February 2, 2019 at 1017 West Onondaga Street, Syracuse, New York, which is the residence of Gavin Ballog and claimant, Johanna Santa-Ballog.

23) During the course of the investigation, agents and law enforcement officers identified 1017 West Onondaga Street as a “stash house” related to the indicted drug conspiracy.

24) Multiple members of the conspiracy and various extended members of the Ballog-Santa family frequented both 1017 West Onondaga Street and the house immediately next-door, 1011 West Onondaga Street, another identified stash house, multiple times per day on a daily basis.

25) Based on their investigation into the illegal narcotics sales of organization leader Gavin Ballog, and the lack of employment of both Gavin Ballog and Johanna Santa-Ballog, agents and law enforcement officers believe the Toyota Venza was purchased with drug proceeds, and was used multiple times by members of the Ballog-Santa family to facilitate narcotics transactions.

26) On November 27, 2018, DEA agents observed Johanna Santa-Ballog and Gavin Ballog utilize the Toyota Venza between 1017 West Onondaga Street and 402 Dudley Street, Syracuse, New York, an identified stash house. Upon information and belief, the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

27) On November 28, 2019, DEA agents observed Johanna Santa-Ballog and Gavin Ballog utilize the Toyota Venza in the vicinity of 402 Dudley Street. Agents believe that the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

28) On January 13, 2019, DEA agents observed Gavin Ballog utilize the Toyota Venza in the vicinity of an identified “stash house” located at 806 First North Street, Syracuse, New York. Gavin Ballog was observed leaving 806 First North Street in the Toyota Venza, and arriving at

1017 West Onondaga Street a short time later carrying a white plastic bag. Agents believe that the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

29) On January 18, 2019, DEA agents observed the Toyota Venza being utilized by Johanna Santa-Ballog's sister and her sixteen year old niece, between 1017 West Onondaga Street and 806 First North Street. Johanna Santa-Ballog's sister left 806 First North Street in the Toyota Venza and met organization member Bryan Morales, an indicted defendant in the criminal case (5:19-CR-189 (GTS)), in the parking lot of the 1<sup>st</sup> North Market, which is approximately 1 ½ blocks from the stash house. Recorded telephone calls confirmed that Johanna Santa-Ballog's sister was picking up a quantity of heroin to "reup" Bryan Morales. Shortly thereafter, the Toyota Venza returned to 1017 West Onondaga Street. Agents believe that the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

30) On January 22, 2019, DEA agents observed the Toyota Venza, along with two other vehicles, parked at an identified "stash house" located at 137 Sunhill Terrace, Syracuse, New York. The vehicles were observed leaving in tandem from 137 Sunhill Terrace and pulling over together a few blocks away. After a brief period of time, they drove again in tandem over to 1017 West Onondaga Street. The occupant of one of the vehicles was later identified as Jesus Lopez-Mendez, an indicted defendant in the criminal case (5:19-CR-189 (GTS)), and Gavin Ballog's heroin source of supply. Upon information and belief, the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

31) On January 23, 2019, DEA agents observed Gavin Ballog and Yan Morales leaving 402 Dudley Street in the Toyota Venza and coming back approximately half an hour later. Upon information and belief, the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

32) On January 24, 2019, DEA agents observed the Toyota Venza being operated by Gavin Ballog, who arrived at 402 Dudley Street and entered the residence. Gavin Ballog left the residence approximately 12 minutes later, re-entered the Toyota Venza, and left the area. Upon information and belief, the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

33) On January 30, 2019, DEA agents observed the Toyota Venza being operated by Gavin Ballog between identified stash houses located at 137 Sunhill Terrace, 402 Dudley Street, and 1017 West Onondaga Street. Upon information and belief, the Toyota Venza was being used on this occasion to facilitate narcotics transactions.

34) Based upon these surveillance operations, investigators believe that the Toyota Venza was used on multiple occasions to facilitate the transportation of heroin and heroin proceeds.

\$9,000.00 in U.S. Currency and \$4,000.00 in U.S. Currency

35) The \$9,000.00 in U.S. Currency and \$4,000.00 in U.S. Currency were seized on February 2, 2019, pursuant to a Federal search warrant executed at 1011 West Onondaga Street, Syracuse, New York, which is an identified stash house, and the residence of claimant, Maria Martinez, and her husband.

36) Johanna Santa-Ballog's sister is also a resident of 1011 West Onondaga Street.

37) On February 2, 2019, during the execution of the Federal search warrant at 1011 West Onondaga Street, which is next-door to and shares a driveway with 1017 West Onondaga Street, agents recovered 300 bricks of packaged heroin, equivalent to 15,000 individual dosage units, and two handguns from a van that was seized from the rear of that residence.

38) The packaged heroin and two handguns were concealed in a sophisticated electronic “trap” compartment in the rear passenger floorboard of the van.<sup>2</sup>

39) The defendant property, \$9,000.00 in U.S. currency, was found at 1011 West Onondaga Street in the bedroom closet of a room occupied by Maria Martinez’s husband.

40) The \$9,000.00 in U.S. currency was bound together with black rubber bands and was located inside a white sock, which was in a grocery bag, which was in a wooden box in the bedroom closet.

41) At the time of the execution of the search warrant, Maria Martinez’s husband told agents that his son, “Ricky,” who was known to law enforcement as “Juan Santa,” dropped the money off the day before. Juan Santa is an indicted defendant in the criminal case (5:19-CR-189 (GTS)).

42) The defendant property, \$4,000.00 in U.S. currency, was found at 1011 West Onondaga Street in a bedroom occupied by claimant, Maria Martinez.

43) The \$4,000.00 in U.S. currency was found in various locations in the bedroom, including sitting in a loose pile on the headboard of the bed. The majority of the currency was located in a gold purse bound together with rubber bands inside of the bedroom closet, and in denominations investigators consider to be consistent with narcotics proceeds.

44) Investigators believe the \$4,000.00 in U.S. currency to be drug proceeds because the currency was found in a manner consistent with narcotics proceeds.

\$2,000.00 of \$19,315.00 in U.S. Currency

45) Claimant, Alexandria LaRose, is the girlfriend of Bryan Morales, an indicted defendant in the criminal case (5:19-CR-189 (GTS)).

---

<sup>2</sup> No claim to this vehicle has been made.



46) Claimant, Alexandria LaRose, is making a claim to \$2,000.00 of the \$19,315.00 in U.S. Currency that was seized on February 2, 2019.

47) \$19,315.00 in U.S. Currency was seized on February 2, 2019, pursuant to a Federal search warrant executed at 143 Annetta Street, Syracuse, New York, which is the residence of Bryan Morales.

48) At the time of the seizure, Claimant, Alexandria LaRose, maintained a residence separate from Bryan Morales.

49) \$19,315.00 in U.S. Currency was found in multiple locations in the bedroom of Bryan Morales, as well as in his mother's bedroom dresser. Claimant asserts an ownership interest in \$2,000.00 of the total currency seized. Investigators did not find an individual bundle of money in the amount of \$2,000.00.

50) The majority of the \$19,315.00 in U.S. Currency was folded and bound together in black rubber bands and in denominations investigators consider to be consistent with narcotics proceeds.

51) Investigators believe the currency to be drug proceeds because the currency was found to be folded and bound in denominations consistent with narcotics proceeds.

2010 Subaru Forester, 2.5X Premium, VIN: JF2SH6CC2AH704182

52) Claimant, Daniqua Hicks, is the registered and titled owner of the 2010 Subaru Forester, 2.5X Premium, VIN: JF2SH6CC2AH704182 ("Subaru Forester").

53) Claimant, Daniqua Hicks, is the live-in girlfriend of Yan Morales, an indicted defendant in criminal case (5:19-CR-189 (GTS)).

54) The Subaru Forester was seized under DEA administrative authority on or about February 2, 2019, pursuant to Federal search warrant executed at the stash house located at 402 Dudley Street, #1, Syracuse, New York, which is the residence of Claimant, Daniqua Hicks.

55) Based upon their investigation, as well as the lack of employment of Yan Morales, and part-time employment of Daniqua Hicks, agents and law enforcement believe the Subaru Forester was purchased with drug proceeds.

56) During the course of the investigation, agents and law enforcement observed the Subaru Forester being used multiple times by Yan and Bryan Morales to facilitate narcotics transactions.

57) On January 18, 2019, Bryan Morales was driving the defendant Subaru Forester during the previously described delivery of heroin by Johanna Santa-Ballog's sister to Bryan Morales, after she left the stash house located at 806 First North Street.

58) On January 23, 2019, Yan Morales was observed by surveillance agents driving the Subaru Forester to and from 1017 West Onondaga Street and 402 Dudley Street with passenger, Bryan Morales. At 1017 West Onondaga Street, Yan Morales was observed carrying a knotted plastic baggie, consistent with the size and consistency of multiple bricks of heroin packaged for resale. Upon information and belief, the Subaru Forester was being used on this occasion to facilitate narcotics transactions.

59) On January 25, 2019, Yan Morales was observed by surveillance agents exiting 402 Dudley Street, retrieving something from a Ford F-150 pickup truck parked outside the property<sup>3</sup>, entering the Subaru Forester, and driving away. Upon information and belief, the Subaru Forester was being used on this occasion to facilitate narcotics transactions.

---

<sup>3</sup> Multiple previous surveillance operations via a pole camera confirmed that Yan Morales stored heroin and narcotics proceeds in the Ford F-150 pickup truck.

60) On January 26, 2019, Yan Morales was observed by surveillance agents being dropped off by Gavin Ballog at 402 Dudley Street, leaving a short time later in the Subaru Forester, and returning shortly thereafter. Upon information and belief, the Subaru Forester was being used on this occasion to facilitate narcotics transactions.

61) On January 31, 2019, surveillance agents observed Yan Morales and Daniqua Hicks exit 402 Dudley Street, enter the Subaru Forester, and drive to Yan Morales' mother's house<sup>4</sup>. A telephone call between Yan Morales and Gavin Ballog occurred during which Yan Morales advised that he was at his mother's house. Upon information and belief, the Subaru Forester was being used on this occasion to facilitate narcotics transactions.

62) Based upon this surveillance, investigators believe the Morales brothers utilized the Subaru Forester to facilitate the transportation of heroin and heroin proceeds.

### CONCLUSION

63) As required by Supplemental Rule G(2)(f), the facts set forth above support a reasonable belief that the government will be able to meet its burden of proof at trial. Specifically, probable cause exists to believe that the defendant properties are money or property furnished or intended to be furnished in exchange for a controlled substance, proceeds traceable to such an exchange, or property used or intended to be used to transport or facilitate the transportation of controlled substances, all in violation of 21 U.S.C. §§ 841 and 846.

WHEREFORE, pursuant to Supplemental Rule G, plaintiff the United States of America, respectfully requests that the Court:

- a) Issue a warrant of arrest *in rem*, in the form submitted with this complaint;

---

<sup>4</sup> Case agents were aware that the Morales brothers used their parents' residence to store narcotics and proceeds of same.

- b) Direct any person having any claim to the defendant properties to file and serve their verified claims and answers as required by 18 U.S.C. § 983(a)(4) and Supplemental Rule G;
- c) Enter judgment declaring the defendant properties to be forfeited and condemned to the use and benefit of the United States; and
- d) Award such other and further relief to the United States as it deems proper and just.

Dated: July 30, 2019

Respectfully Submitted,

GRANT C. JAQUITH  
United States Attorney

By: /s/ Mary E. Langan  
Mary E. Langan  
Assistant United States Attorney  
Bar Roll No. 518971

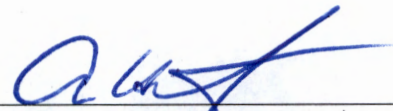
**VERIFICATION**

STATE OF NEW YORK            )  
  ) ss:  
COUNTY OF ONONDAGA        )

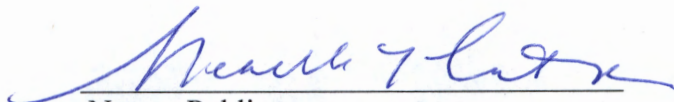
Anthony Hart, being duly sworn, deposes and states:

I am a Federal Agent with the Drug Enforcement Administration. I have read the foregoing Complaint for Forfeiture and assert that the facts contained therein are true to the best of my knowledge and belief, based upon knowledge possessed by me and/or on information received from other law enforcement officers.

Dated this 30th day of July, 2019.

  
\_\_\_\_\_  
Anthony Hart, Federal Agent  
Drug Enforcement Administration

Sworn to and subscribed before me this 30th day of July, 2019.

  
\_\_\_\_\_  
Notary Public

MICHELLE J. TROUBETARIS  
Notary Public - State of New York  
Qualified in Onondaga County  
No. 01TR6152879  
My Commission Expires September 25, 2022

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff Onondaga  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)  
Mary E. Langan, Assistant U.S. Attorney (315) 448-0650  
United States Attorney's Office, 100 South Clinton Street  
Syracuse, New York 13261

**DEFENDANTS**

One 2012 Toyota Venza XLE, VIN # 4T3B3BB7CU073918, et al.

County of Residence of First Listed Defendant Onondaga

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION**

(Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**

(For Diversity Cases Only)

(Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |  | PTF                        | DEF                        |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT**

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

21 USC 881

Brief description of cause:

Drug conspiracy related seizure of currencies and vehicles

**VII. REQUESTED IN COMPLAINT:**
☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

Hon. Glenn T. Suddaby

DOCKET NUMBER

5:19-CR-189

DATE

SIGNATURE OF ATTORNEY OF RECORD

07/30/2019

s/Mary E. Langan

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT Waived APPLYING IFP \_\_\_\_\_ JUDGE GTS MAG. JUDGE TWD

Print

Save As...

Export as FDF

Retrieve FDF File

Reset